

EXHIBIT B



Bryan B. Todd
btodd@kba.law

Salt Lake: 801.994.4646

VIA EMAIL

David Johnson
Brittany Frandsen
60 East South Temple
Suite 10000
Salt Lake City, UT 84109

Re: Thread Wallets, LLC v. Brixley Bags LLC

Counsel:

In response to your letter dated June 13, 2024, we met and conferred via Microsoft Teams last Friday, June 21, 2024. This letter addresses the outstanding issues discussed in that meeting.

Failure to Supplement RFP Responses

Brixley responds that, with the production provided today, it is not withholding any responsive documents. All supplemental materials have been provided except for documents responsive to social media comments responsive to RFP No. 23. As discussed last week, those responses will be provided by July 5, 2024.

Signature on Supplemental Interrogatories

Provided today is the signed verification for Brixley's supplemental interrogatory responses.

Infringement Theory Objection

As discussed last week, we are maintaining our infringement theory objections. However, we have now provided prior art that forms the basis of our invalidity contentions as requested.

Privilege Objection

We have Identified Lauren Swenson as an IP paralegal at KB&A, and Henry O'Connell as a client representative and consultant.

Interrogatory No. 2 and RFP Nos. 6 and 7



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In response to your request that more information be provided in response to Interrogatory No. 2, Brixley states the following:

Kimberly frequently used her Fawn Design mini backpack because it was able to function as a backpack or a side purse. In 2019, while on a trip, Kimberly became increasingly frustrated with the need to have multiple bags, and with the size of her Fawn Design bag. She remembered seeing a crossbody bag at the Coca-Cola store in Las Vegas and thought that it would be a great type of bag to have. Having already started her travel brand and working on selling packing cubes, Kimberly decided that she could create a crossbody bag that could serve a variety of functions, eliminating the need for multiple bags. Kimberly envisioned a bag that could hold credit cards, keys, and other everyday items. Kimberly discussed this type of bag on videoconferences with her packing cube manufacturer. Upon further investigation, she found square and rectangular bags available on Alibaba.com. Over several months, Kimberly discussed her version of the crossbody bag with her manufacturer, ultimately resulting in the Brixley crossbody bag.

In response to the further requests for supplementation to RFP nos. 6 and 7, Brixley has now provided communications with their Alibaba supplier, designated Attorney's Eyes Only, as the communications contain references to confidential business information regarding products being developed, or that could go to market. Brixley notes that many of the conversations related to the development of the Crossbody bag were held via video conference, and there is not a record of those meetings.

RFP 21

Brixley has produced all documents responsive to this request in their possession.

Interrogatory No. 5

Brixley responds that it changed the zipper on from the original crossbody bag by moving the position up higher on the second iteration of the bag.

Interrogatory Nos. 7-8 and RFP Nos. 25-26

Brixley has now produced several documents relevant to invalidity issues. Brixley has not withheld any documents currently in its possession relevant to these requests.

Interrogatory No. 10

As previously discussed, this interrogatory response is sufficient and proper for written discovery. The communications between James McConkie and Scott Hilton, as well as



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subsequent
silence while Brixley grew its business, form the obvious basis for estoppel and related arguments.

Interrogatory No. 12 and RFP No. 33

Brixley has provided all documents in their possession responsive to this request and is not withholding any responsive documents.

RFP Nos. 2 and 3

Brixley has now produced complete text message conversations responsive to this request.

RFP Nos. 9-10

Brixley responds that it has now produced all documents responsive to this request.

RFP No. 28

Brixley responds that there are no other products to go with the bags other than the strap. Brixley is not withholding any responsive documents

RFP No. 29

Brixley has produced all documents in its possession relative to this response.

Brixley has produced all relevant documents as discussed above.

Best Regards,

KUNZLER BEAN & ADAMSON

A handwritten signature in blue ink, appearing to read 'Bryan B. Todd', with a stylized flourish at the end.

Bryan B. Todd
Chad S. Pehrson